



U.S. Department of Justice

United States Attorney Southern District of New York

86 Chambers Street New York, NY 10007

March 11, 2022

BY ECF

Honorable Paul A. Engelmayer United States District Judge 40 Foley Square New York, NY 10007

Re: Reclaim the Records, et al. v. U.S. Department of Veterans Affairs, 18 Civ. 8449 (PAE)

Dear Judge Engelmayer:

This Office represents the United States Department of Veterans Affairs (the "VA") in this Freedom of Information Act ("FOIA") case. On behalf of the parties, we write pursuant to this Court's Order, which directed the parties to file "a letter explaining what, if any, issues are outstanding in the case." Dkt. No. 51.

The parties do not presently anticipate any further disputes between the parties that will require judicial intervention. The only remaining tasks to be accomplished by the parties relating to this case are: (1) the VA's final production, as approved by the Court, *see* Dkt. No. 51; (2) the parties' effectuation of the stipulation and order for Plaintiffs' claims for attorneys' fees, *see* Dkt. No. 52. In the event that any dispute between the parties arises on either of these two issues, we will promptly notify the Court.

We thank the Court for its consideration of this matter.

Respectfully,

DAMIAN WILLIAMS United States Attorney

By: /s/ Charles S. Jacob

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cc: Counsel of record (via ECF)